

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:	§	
	§	Case No. 20-33665
EBONY MEDIA OPERATIONS, <i>et</i>	§	(Chapter 7)
<i>al.</i> <sup>1</sup>	§	<i>Jointly Administered</i>
	§	
<i>Debtor.</i>	§	

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TRUSTEE'S MOTION TO TERMINATE JOINT ADMINISTRATION

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THIS MOTION SEEKS AND ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE EDUARDO V. RODRIGUEZ,  
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Christopher Murray, chapter 7 trustee ("Trustee") for the jointly administered estates of Ebony Media Operations, *et al.*, ("Debtors"), files this *Motion to Terminate Joint Administration* (the "Motion"), and respectfully states the following:

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<sup>1</sup> The Debtors in these cases are: (a) Ebony Media Operations, LLC (No. 20-33665) and (b) Ebony Media Holdings, LLC (No. 20-33667).

### **BACKGROUND**

1. On July 23, 2020, an involuntary petition for relief under chapter 7 of the Bankruptcy Code was filed for Ebony Media Operations, LLC by petitioning creditor Parkview Capital Credit, Inc. (the “**Petition Date**”) [DE 1].
2. On September 3, 2020, the case was converted to a complex chapter 11 [DE 45].
3. On September 9, 2020, the Court entered an *Order Granting Joint Administration* [DE 58] directing the joint administration of (a) Ebony Media Operations, LLC (Case No. 20-33665) and (b) Ebony Media Holdings, LLC (Case No. 20-33667).
4. On September 30, 2021, the chapter 11 cases were converted to chapter 7 [DE 430] (“**Conversion Date**”) and Christopher Murray was duly appointed as the chapter 7 trustee of the Debtors’ respective estates.
5. Ebony Media Holdings, LLC is the 100% equity interest owner of Ebony Media Operations, LLC.

### **RELIEF REQUESTED**

6. The majority of Ebony Media Operations, LLC’s assets were sold pursuant to an order of this Court authorizing the sale of substantially all of its assets [DE 285]. The remaining assets of Ebony Media Operations, LLC after the sale transaction essentially consisted of three things: (i) cash; (ii) potential litigation claims; and (iii) a potential interest in an “IP Holdback” relating to the sale of substantially of its assets and subject to a claimed security interest. The Trustee has determined that the cash is the only asset of this estate that warrants administration.
7. The Trustee has determined that the Ebony Media Holdings, LLC estate does not have sufficient assets to warrant administration. Its sole remaining asset is the 100% equity interest in Ebony Media Operations, LLC, which is also insolvent. There will be no equity to disburse to Ebony Media Holdings, LLC. The Trustee intends to file a report of no distribution in this estate.

8. The Trustee believes that it is in the best interest of both estates to terminate joint administration to prevent any confusion among the creditors of the respective estates and to allow the Trustee to take the necessary steps to close these estates.

**PRAYER**

9. **WHEREFORE**, the Trustee respectfully requests that the Court issue an order terminating the joint administration of the estates, directing entry of this order on the docket in both cases, and granting such other and further relief as the Court deems appropriate under law or equity.

Dated: January 12, 2024

Respectfully submitted,

**JONES MURRAY LLP**

/s/ Jacqueline Q. Chiba

Jacqueline Q. Chiba

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**COUNSEL FOR CHRISTOPHER MURRAY,  
CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2024 a true and correct copy of the forgoing document was served (i) electronically on all parties registered for and entitled to notice through the Court's CM/ECF noticing system, and (ii) via U.S. First Class Mail, postage prepaid, on all parties listed on the Debtors' mailing matrix.

/s/ Jacqueline Q. Chiba

Jacqueline Q. Chiba